

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**GRECIA ESTATE HOLDINGS LLC,**

**Plaintiff,**

**v.**

**BROADWAY NATIONAL BANK,**

**Defendant.**

**Civil Action No.: 6:21-cv-1025**

**JURY TRIAL DEMANDED**

**COMPLAINT FOR PATENT INFRINGEMENT**

Grecia Estate Holdings LLC ("Grecia Estate") brings this patent-infringement action against Broadway National Bank ("Broadway Bank").

**Parties**

1. Plaintiff Grecia Estate Holdings LLC is a Texas limited liability company with its principal place of business in Austin, Texas.

2. Broadway National Bank is a Texas State Financial Institution having its principal place of business in San Antonio, Texas.

**Jurisdiction and Venue**

3. This action arises under the patent laws of the United States, 35 U.S.C. §§ 101 *et seq.*

4. This Court has subject matter jurisdiction over this action under 28 U.S.C. §§ 1331 and 1338(a).

5. This Court may exercise personal jurisdiction over Broadway Bank. Broadway Bank conducts continuous and systematic business in this District; and this patent-infringement

case arises directly from Broadway Bank's continuous and systematic activity in this District. In short, this Court's exercise of jurisdiction over Broadway Bank would be consistent with the Texas long-arm statute and traditional notions of fair play and substantial justice.

6. Venue is proper in this District pursuant to 28 U.S.C. §§ 1391(b)(1)-(2) and 1400(b).

**Direct Infringement of U.S. Patent No. 8,402,555**

7. Grecia Estate is the exclusive owner of United States Patent No. 8,402,555 (the “555 patent”). Attached hereto as “Exhibit A.”

8. The '555 patent is valid and enforceable.

9. Broadway Bank infringes claim 17 of the '555 patent. Broadway Bank makes, uses, and sells a computer program product.

10. Attached hereto as “Exhibit B” and incorporated into this complaint as if alleged herein is a claim chart setting forth the language of claim 17 and the accused Broadway Bank computer program product.

11. The Broadway Bank computer program product receives, requests, and makes a second receipt from and with a “communications console” that is separate from the computer program product. The “communications console” is the GUI and API of the Broadway Bank application, separate from the Broadway Bank computer program product.

**Prayer for Relief**

WHEREFORE, Grecia Estate prays for the following relief against Broadway Bank:

- (a) Judgment that Broadway Bank has infringed claim 17 of the '555 patent;
- (b) For a reasonable royalty;

- (c) For pre-judgment interest and post-judgment interest at the maximum rate allowed by law;
- (d) For injunctive relief, including a preliminary injunction; and
- (e) For such other and further relief as the Court may deem just and proper.

**Demand for Jury Trial**

Grecia Estate demands a trial by jury on all matters and issues triable by jury.

Respectfully Submitted,

Date: October 4, 2021

/s/Artoush Ohanian  
H. Artoush Ohanian  
Texas State Bar No. 24013260  
[artoush@ohanianip.com](mailto:artoush@ohanianip.com)  
OHANIANIP  
604 West 13th Street  
Austin, Texas 78701  
(512) 298.2005 (telephone & facsimile)

Matthew M. Wawrzyn (*pro hac vice* application forthcoming)  
[matt@wawrzynlaw.com](mailto:matt@wawrzynlaw.com)  
WAWRZYN LLC  
200 East Randolph Street, Suite 5100  
Chicago, IL 60601  
(312) 235-3120 (telephone)  
(312) 233-0063 (facsimile)

*Counsel for Grecia Estate Holdings LLC*